

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION

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September 23, 1988

Mr. Richard M. Ross  
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CLEAN-UP AND ABATEMENT ORDER 88-057 (FILE NO. 86-68)

The subject clean-up and abatement order is numbered CA0-88-057 rather than 88-2. The number actually on the order was apparently reassigned during delays in the approval/mailout cycle. Please revise your files accordingly.

An inspection was made of Monadnock Company at 18301 East Arenth Avenue on August 4, 1988. It was noted that use of 1,1,1-Trichloroethane (TCA) continues and that potential pathways to ground still exist at the site. The petition seeking revision of the subject CAO states that the petitioner is a newly formed corporation which has been in operation at the Monadnock site for little over a year and that it does not discharge or permit the discharge of hazardous waste in violation of the law. 1,1,1-TCA is found in both the soil and ground water underlying the site, and the petitioner has continued operations which may in part have led to the discharge of 1,1,1-TCA among other chemicals. Open pails of this solvent are transported through the facility to the area where utilized and transported back again as a waste. The existence of floor drains, apparently leading to the clarifier, a short distance away from the current barrel storage of both fresh and waste solvent and the practice of handling the materials in open containers represent a continuing threat. The entire former degreasing area, floor drain system and industrial waste clarifier must yet be investigated under the CAO. This continuation of practices and existence of pathways from the former Monadnock to the "new" Monadnock make it unreasonable to sever the petitioner at this time from the CAO.

During the inspection it was noted that many of the practices, chemical and waste storage areas and stocks of chemicals appear to be in a state of change. For instance, it was indicated that the clarifier operation had been altered about a month and half prior to the inspection and that large numbers of barrels of solidified waste were stored on the dock at the side of the plant. You are directed to provide to this Regional Board the following information and data:

- 1) Describe the utilization of chemicals before and after purchase.
- 2) Indicate any changes in the product line.

- 3) Provide copies of all waste manifests over the interval of operation.
- 4) Describe in detail the chemicals being drummed and stored.
- 5) Provide copies of all chemical analyses made of effluent from the clarifier or other waste sources by any parties (such as Anacon Laboratories or County Sanitation) during petitioner's operation.
- 6) Obtain from the former owner(s) copies of similar information from prior operations and provide to the Board.
- 7) Provide names and other pertinent data for all waste haulers.

Although only a little discharge may have resulted from your client's short tenure at the site, it may not be separable at this time from that which had occurred during prior operations. Therefore the petition should be denied until further data are developed relative to utilization practices etc. The data requested should be provided to this Regional Quality Control Board by October 21, 1988.

If you have any questions, please contact Philip B. Chandler at (213) 620-65091.



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PBC:sml

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